

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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STUART E. HERSH,

Plaintiff / Judgment-
Creditor,

Docket No:
12-mc-153

-against-

NOTICE OF MOTION

ISLAMIC REPUBLIC OF IRAN,

Defendant / Judgment-
Debtor

-and-

WARWICK NEW YORK HOTEL

Garnishee.

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C O U N S E L :

PLEASE TAKE NOTICE that upon the annexed memorandum of law dated September 11, 2012; the exhibits annexed thereto; and upon the pleadings and proceedings heretofore had herein, the plaintiff will move this Court, at the Courthouse located at 500 Pearl Street, Brooklyn, New York, at a date and time to be fixed by the court, at 9:30 o'clock in the forenoon of that day, or as soon thereafter as counsel can be heard, for an Order pursuant to CPLR § 5225(b) DIRECTING that:

a) Respondent Warwick turn over to the Plaintiff, through delivery to his undersigned counsel, the value of the moneys paid and/or to be paid by the Islamic Republic of Iran for hotel rooms at Respondent Warwick;

b) Respondent Warwick turn over to the Plaintiff, through delivery to his undersigned counsel, exclusive access to the hotel rooms designated for the Islamic Republic of Iran or its president Mahmoud Ahmadinejad and/or the hotel rooms designated for them;

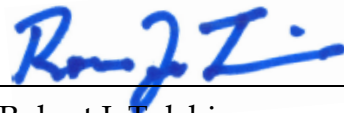
c) Respondent Warwick exclude Ahmadinejad from its premises and provide to the Plaintiff, through delivery to his undersigned counsel, any refund due; and

d) GRANTING such other and further relief as is just and proper under the circumstances.

Dated: Brooklyn, New York
September 14, 2012

Respectfully submitted,

THE BERKMAN LAW OFFICE, LLC
*Attorneys for the Plaintiff/ Judgment-
Creditor*

by: 
Robert J. Tolchin

111 Livingston Street, Suite 1928
Brooklyn, New York 11201
718-855-3627

TO: Warwick New York Hotel
65 West 54th Street
New York, New York 10019

Islamic Republic of Iran
c/o Foreign Minister Manouchehr Mottaki
Ministry of Foreign Affairs
Khomeini Ave. United Nations St.
Teheran
Iran

